

# **EXHIBIT A**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**D.N.J. LBR 2016-1, FEE APPLICATION COVER SHEET**

IN RE: LTL Management LLC

APPLICANT: Massey & Gail LLP

CASE NO.: 23-12825 (MBK)

CLIENT: Official Committee of Talc Claimants

CHAPTER: 11

CASE FILED: April 4, 2023

COMPLETION AND SIGNING OF THIS FORM CONSTITUTES A CERTIFICATION UNDER  
PENALTY OF PERJURY, PURSUANT TO 28 U.S.C. SECTION 1746

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**SECTION I**  
**FEE SUMMARY**

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First Post Dismissal Monthly Fee Statement Covering the Period  
August 12, 2023 Through August 31, 2023

Post Dismissal Monthly Fee Statement No. 1

Summary of Accounts Requested for the Period from August 12, 2023 through August 31, 2023 (the "First Post Dismissal Statement Period"):

Total fees:	\$ 73,351.00
Total disbursements:	\$ 0.00
Minus 20% Holdback of Fees:	\$ 14,670.20
Amount Sought at this Time:	\$ 58,680.80

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation
Jonathan Massey	1992	\$1160.00	27.0	\$31,320.00
Rachel Morse	2007	\$860.00	3.8	\$3,268.00
Bret Vallacher	2014	\$775.00	18.1	\$14,027.50
Matthew Layden	2019	\$500.00	23.4	\$11,700.00
Usama Ibrahim	2021	\$485.00	24.7	\$11,979.50
Rob Aguirre	N/A	\$320.00	3.3	\$1,056.00
<b>TOTAL FEES</b>				<b>\$73,351.00</b>
<b>BLENDED RATE</b>		<b>\$731.32</b>	<b>100.3</b>	

Pursuant to the Amended Fee Procedures Order, currently requested fees are net of a 20% holdback. A request for the holdback amount will be included in the next interim fee application:

Fees	\$ 73,351.00
Less: Holdback (20%)	-\$ 14,670.20
Total Fees Currently Payable	<u>\$ 58,680.80</u>
Add: Disbursements	\$ 0.00
<b>Total Payable This Invoice</b>	<u><u><b>\$ 58,680.80</b></u></u>

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**SECTION II  
SUMMARY OF SERVICES**

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SERVICES RENDERED	HOURS	FEE
Fee/Employment Application (B160)	4.8	\$2,346.00
Appellate Briefs (L520)	95.5	\$71,005.00
<b>TOTAL</b>	<b>100.3</b>	<b>\$73,351.00</b>

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**SECTION III  
SUMMARY OF DISBURSEMENTS**

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	AMOUNT
	0.00
<b>TOTAL DISBURSEMENTS</b>	<b>0.00</b>

I certify under penalty of perjury that the foregoing is true and correct.

/s/Jonathan S. Massey  
Jonathan S. Massey

Dated: September 15, 2023

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
<b>GENOVA BURNS LLC</b> Daniel M. Stolz, Esq. Donald W. Clarke, Esq. dstolz@genovaburns.com dclarke@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 467-2700 Fax: (973) 467-8126 <i>Local Counsel for the Official Committee of Talc Claimants</i>	<b>BROWN RUDNICK LLP</b> David J. Molton, Esq. Michael S. Winograd, Esq. Susan Sieger-Grimm, Esq. Kenneth J. Aulet, Est. dmolton@brownrudnick.com mwinograd@brownrudnick.com ssieger-grimm@brownrudnick.com kaulet@brownrudnick.com Seven Times Square New York, NY 10036 Tel: (212) 209-4800 Fax: (212) 209-4801  and  Jeffrey L. Jonas, Esq. Sunni P. Beville, Esq. Eric B. Goodman, Esq. jjonas@brownrudnick.com sbeville@brownrudnick.com eggodman@brownrudnick.com One Financial Center Boston, MA 02111 Tel: (617) 856-8200 Fax: (617) 856-8201 <i>Co-Counsel for the Official Committee of Talc Claimants</i>
<b>OTTERBOURG PC</b> Melanie L. Cyganowski, Esq. Jennifer S. Feeney, Esq. Michael R. Maizel, Esq. mcyganowski@otterbourg.com jfeeney@otterbourg.com mmaizel@otterbourg.com 230 Park Avenue New York, NY 10169 Tel: (212) 905-3628 Fax: (212) 682-6104 <i>Co-Counsel for the Official Committee of Talc Claimants</i>	<b>MASSEY &amp; GAIL LLP</b> Jonathan S. Massey, Esq. Rachel S. Morse, Esq. jmassey@masseygail.com rmorse@masseygail.com 100 Main Ave. SW, Suite 450 Washington, DC 20024 Tel: (202) 652-4511 Fax: (312) 379-0467 <i>Special Counsel for the Official Committee of Talc Claimants</i>

In Re:  
**LTL MANAGEMENT, LLC,<sup>1</sup>**  
  
Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

**FIRST POST DISMISSAL MONTHLY FEE STATEMENT OF MASSEY & GAIL, LLP,  
SPECIAL COUNSEL TO OFFICIAL COMMITTEE OF TALC CLAIMANTS  
FOR THE PERIOD AUGUST 12, 2023 THROUGH AUGUST 31, 2023**

MASSEY & GAIL, LLP (“Massey Gail”) submits this First Post Dismissal Monthly Fee Statement for Services Rendered and Expenses Incurred as Special Counsel to the Official Committee of Talc Claimants (the “Statement”) for the period commencing August 12, 2023 and ending August 31, 2023 (the “First Post Dismissal Statement Period”), pursuant to the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals by Order of this Court entered on May 22, 2023 (the “Interim Compensation Order”).

The billing invoices for the Statement Period are annexed hereto as Exhibit “A”. These invoices detail the services performed. The fees sought within Statement Period are as follows:

<b>Fees</b>	<b>Less 20%</b>	<b>Fee Payment Requested</b>	<b>Expense Reimbursement (100%)</b>
\$73,351.00	(\$14,670.20)	\$58,680.80	\$0.00

WHEREFORE, Massey Gail respectfully requests interim payment of fees for this Statement Period in the sum of \$58,680.80 in accordance with the terms of the Interim Compensation Order.

<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

**MASSEY & GAIL, LLP**

*Special Counsel to Official Committee  
of Talc Claimants*

By: /s/ Jonathan S. Massey

**JONATHAN S. MASSEY**

Dated: September 15, 2023

**EXHIBIT A**  
**TIME DETAIL**



## **EXHIBIT A**

### **TIME DETAIL**

50 E. Washington St.  
Suite 400  
Chicago, IL 60602  
(312) 283-1590

**MASSEY  
& GAIL** LLP

1000 Maine Ave. SW  
Suite 450  
Washington, D.C. 20024  
(202) 652-4511

***PRIVILEGED & CONFIDENTIAL***

September 11, 2023

**Official Committee of Talc Claimants**

In re LTL Management, No 23-12825  
United States Bankruptcy Court for the District of New Jersey

Invoice Period: 08-12-2023 - 08-31-2023

**RE: LTL Management Bankruptcy Official TCC II**

**Time Details**

Date	Professional	Task	Hours	Rate	Amount
08-12-2023	JSM	L520 - Appellate Briefs	1.30	1,160.00	1,508.00
		Drafting outline of appellate brief in response to J&J announcement of appeal.			
08-13-2023	JSM	L520 - Appellate Briefs	1.40	1,160.00	1,624.00
		Further drafting outline of appellate brief in response to J&J announcement of appeal.			
08-13-2023	RSM	B160 - Fee/Employment Application	0.30	860.00	258.00
		Further work on monthly fee statement for July services.			
08-14-2023	BV	L520 - Appellate Briefs	0.60	775.00	465.00
		Revising letters to district court regarding appeals to incorporate feedback from J. Lamken and M. Winograd.			
08-14-2023	BV	L520 - Appellate Briefs	0.40	775.00	310.00
		Reviewing correspondence from co-counsel for developments to craft potential responses.			
08-14-2023	UI	L520 - Appellate Briefs	4.70	485.00	2,279.50
		Research re appellate standard for review of Judge Kaplan's ruling on financial distress.			
08-14-2023	BV	L520 - Appellate Briefs	2.40	775.00	1,860.00
		Drafting letters to district court regarding appeals in compliance with dismissal order.			
08-14-2023	BV	L520 - Appellate Briefs	0.70	775.00	542.50
		Analyzing dismissal order for the purpose of drafting letters to district court regarding appeals.			
08-14-2023	JSM	L520 - Appellate Briefs	0.30	1,160.00	348.00
		Email communication with TCC counsel re strategy for appeal.			
08-14-2023	JSM	L520 - Appellate Briefs	1.90	1,160.00	2,204.00
		Further drafting outline of TCC appellee's brief in preparation for CA3 appeal.			
08-14-2023	RSM	L520 - Appellate Briefs	0.20	860.00	172.00
		Correspondence with co-counsel re appeal of dismissal order.			
08-15-2023	JSM	L520 - Appellate Briefs	2.80	1,160.00	3,248.00
		Further drafting outline of TCC appellee's brief in preparation for CA3 appeal.			
08-15-2023	UI	L520 - Appellate Briefs	0.70	485.00	339.50
		Meeting with M. Layden re appellate standard for review of Judge Kaplan's ruling on financial distress.			
08-15-2023	BV	L520 - Appellate Briefs	0.20	775.00	155.00
		Conference with R. Hashem and J. Lamken re MTD appeal.			
08-15-2023	BV	L520 - Appellate Briefs	0.70	775.00	542.50
		Conference with R. Hashem, M. Winograd, and J. Lamken re MTD appeal.			
08-15-2023	RSM	B160 - Fee/Employment Application	0.20	860.00	172.00

Date	Professional	Task	Exhibit	Hours	Rate	Amount
		Correspondence with colleagues and co-counsel re final fee applications.				
08-16-2023	RSM	L520 - Appellate Briefs		0.80	860.00	688.00
		Conference with co-counsel, committee member, and representatives re appeal next steps.				
08-16-2023	RA	B160 - Fee/Employment Application		0.70	320.00	224.00
		Revise third interim monthly fee statement for July 1, 2023 - July 31, 2023.				
08-16-2023	UI	L520 - Appellate Briefs		0.90	485.00	436.50
		Meeting with committee and co-counsel to discuss forthcoming legal strategy re Third Circuit appeal.				
08-16-2023	ML	L520 - Appellate Briefs		0.90	500.00	450.00
		Attending committee meeting regarding appellate strategy.				
08-16-2023	BV	L520 - Appellate Briefs		0.90	775.00	697.50
		Conference with committee members, co-counsel, and representatives regarding appeal strategy.				
08-16-2023	JSM	L520 - Appellate Briefs		2.10	1,160.00	2,436.00
		Further drafting outline of TCC appellee's brief in preparation for CA3 appeal.				
08-16-2023	JSM	L520 - Appellate Briefs		0.30	1,160.00	348.00
		Email communication with Massey & Gail team re appellate brief.				
08-16-2023	JSM	L520 - Appellate Briefs		0.40	1,160.00	464.00
		Email communication with TCC counsel re strategy for appeal.				
08-16-2023	JSM	L520 - Appellate Briefs		0.40	1,160.00	464.00
		Email communication with Massey & Gail team re strategy for appeal.				
08-17-2023	JSM	L520 - Appellate Briefs		0.40	1,160.00	464.00
		Email communication with Massey & Gail team re strategy for appeal.				
08-17-2023	JSM	L520 - Appellate Briefs		0.20	1,160.00	232.00
		Email communication with Massey & Gail team re appellate brief.				
08-17-2023	JSM	L520 - Appellate Briefs		3.10	1,160.00	3,596.00
		Further drafting outline of TCC appellee's brief in preparation for CA3 appeal.				
08-17-2023	BV	L520 - Appellate Briefs		1.30	775.00	1,007.50
		Formulating arguments for M. Layden and U. Ibrahim to research and draft in appellee response brief.				
08-17-2023	BV	L520 - Appellate Briefs		0.40	775.00	310.00
		Revising letters to district court regarding appeals to incorporate feedback from committee counsel.				
08-17-2023	UI	L520 - Appellate Briefs		3.00	485.00	1,455.00
		Researching caselaw re basis for reversal pertaining to exceptions to dismissal under 1112(b)(2).				
08-17-2023	RSM	B160 - Fee/Employment Application		0.20	860.00	172.00
		Revised fee statement for July services.				
08-17-2023	RA	B160 - Fee/Employment Application		0.40	320.00	128.00
		Finalize third interim monthly fee statement for July 1, 2023 - July 31, 2023 for filing.				
08-18-2023	BV	L520 - Appellate Briefs		0.10	775.00	77.50
		Correspondence with TCC re filing letters to district court regarding appeals.				
08-18-2023	JSM	L520 - Appellate Briefs		4.10	1,160.00	4,756.00
		Further drafting outline of TCC appellee's brief in preparation for CA3 appeal.				
08-18-2023	UI	L520 - Appellate Briefs		2.70	485.00	1,309.50
		Researching caselaw re basis for reversal pertaining to exceptions to dismissal under 1112(b)(2).				
08-18-2023	BV	L520 - Appellate Briefs		0.10	775.00	77.50
		Instructing local counsel re filing letters to district court regarding appeals.				
08-18-2023	BV	L520 - Appellate Briefs		0.40	775.00	310.00
		Discussing research topics for the appeal brief with M. Layden.				
08-19-2023	JSM	L520 - Appellate Briefs		0.20	1,160.00	232.00
		Email communication with Massey & Gail team re appellate brief.				
08-19-2023	JSM	L520 - Appellate Briefs		2.20	1,160.00	2,552.00
		Revising outline of TCC appellee's brief in preparation for CA3 appeal.				
08-20-2023	JSM	L520 - Appellate Briefs		0.30	1,160.00	348.00
		Email communication with Massey & Gail team re appellate brief.				
08-20-2023	JSM	L520 - Appellate Briefs		3.30	1,160.00	3,828.00
		Further revising outline of TCC appellee's brief in preparation for CA3 appeal.				

Date	Professional	Task	Exhibit	Hours	Rate	Amount
08-21-2023	BV	L520 - Appellate Briefs		6.90	775.00	5,347.50
		Revising appeal brief outline drafted by J. Massey.				
08-21-2023	UI	L520 - Appellate Briefs		0.70	485.00	339.50
		Meeting with M. Layden re CA3 cases deferring to lower-court determinations on expert credibility.				
08-21-2023	UI	L520 - Appellate Briefs		5.60	485.00	2,716.00
		Researching CA3 cases deferring to lower-court determinations on expert credibility.				
08-21-2023	UI	L520 - Appellate Briefs		0.40	485.00	194.00
		Revising motion to dismiss appeal brief outline.				
08-21-2023	UI	L520 - Appellate Briefs		0.30	485.00	145.50
		Drafting email communication to J. Massey, B. Vallacher, and M. Layden re CA3 cases reviewing lower-court determinations on expert credibility.				
08-21-2023	RSM	B160 - Fee/Employment Application		0.30	860.00	258.00
		Worked on monthly fee statement for August services, pre-dismissal.				
08-21-2023	RSM	B160 - Fee/Employment Application		0.10	860.00	86.00
		Correspondence with colleagues re monthly fee statement for August services.				
08-21-2023	JSM	L520 - Appellate Briefs		0.30	1,160.00	348.00
		Communication with Massey & Gail team re draft outline of appellees' brief.				
08-21-2023	JSM	L520 - Appellate Briefs		0.30	1,160.00	348.00
		Email communication with TCC appellate counsel re appellees' brief.				
08-21-2023	ML	L520 - Appellate Briefs		2.90	500.00	1,450.00
		Analyzing draft MTD appeal brief outline.				
08-21-2023	ML	L520 - Appellate Briefs		4.30	500.00	2,150.00
		Researching legal issues associated with the appointment of a trustee pursuant to Section 1112				
08-22-2023	ML	L520 - Appellate Briefs		1.40	500.00	700.00
		Further researching legal issues associated with the appointment of a trustee pursuant to Section 1112.				
08-22-2023	ML	L520 - Appellate Briefs		4.90	500.00	2,450.00
		Drafting memo relating to the appointment of a trustee pursuant to Section 1112.				
08-22-2023	UI	L520 - Appellate Briefs		0.80	485.00	388.00
		Meeting with M. Layden re appellate decisions deferring to the district court on findings of financial distress.				
08-22-2023	UI	L520 - Appellate Briefs		1.40	485.00	679.00
		Research re appellate decisions deferring to district court findings regarding financial distress.				
08-22-2023	RA	B160 - Fee/Employment Application		1.10	320.00	352.00
		Draft fourth interim monthly fee statement for August 1, 2023 - August 11, 2023.				
08-23-2023	BV	L520 - Appellate Briefs		1.30	775.00	1,007.50
		Drafting memorandum to appellate team regarding cross-appeals.				
08-23-2023	UI	L520 - Appellate Briefs		1.00	485.00	485.00
		Meeting with committee and co-counsel to discuss forthcoming legal strategy re possible Third Circuit appeal.				
08-23-2023	UI	L520 - Appellate Briefs		0.30	485.00	145.50
		Meeting with M. Layden re the substantive issues discussed in Purdue.				
08-23-2023	RSM	L520 - Appellate Briefs		1.00	860.00	860.00
		Participated in weekly conference with co-counsel and committee representatives re appellate issues and strategies.				
08-23-2023	RSM	L520 - Appellate Briefs		0.30	860.00	258.00
		Correspondence with colleagues re question re scope of appellate work.				
08-23-2023	ML	L520 - Appellate Briefs		1.00	500.00	500.00
		Attending weekly committee meeting regarding appellate strategy.				
08-23-2023	ML	L520 - Appellate Briefs		0.30	500.00	150.00
		Discussion with U. Ibrahim regarding substantive legal issue being appealed in Purdue case.				
08-23-2023	JSM	L520 - Appellate Briefs		0.40	1,160.00	464.00
		Email communication with TCC appellate counsel re appellees' brief.				
08-23-2023	ML	L520 - Appellate Briefs		5.30	500.00	2,650.00
		Drafting memo relating to the appointment of a trustee pursuant to Section 1112.				
08-23-2023	RA	B160 - Fee/Employment Application		0.40	320.00	128.00

Date	Professional	Task	Exhibit	Hours	Rate	Amount
		Work on final fee application.				
08-24-2023	ML	L520 - Appellate Briefs		1.70	500.00	850.00
		Further drafting memo relating to the appointment of a trustee pursuant to Section 1112.				
08-24-2023	JSM	L520 - Appellate Briefs		0.30	1,160.00	348.00
		Email communication with TCC appellate counsel re appellees' brief.				
08-24-2023	RSM	B160 - Fee/Employment Application		0.20	860.00	172.00
		Worked on fee statement for August 1-11 services.				
08-25-2023	BV	L520 - Appellate Briefs		0.40	775.00	310.00
		Analyzing question from J. Lamken re potential cross-appeals.				
08-25-2023	UI	L520 - Appellate Briefs		0.20	485.00	97.00
		Reviewing LTL's notice of appeal circulated by Susan Sieger-Grimm.				
08-25-2023	UI	L520 - Appellate Briefs		0.30	485.00	145.50
		Research re appellate decisions deferring to the district court on findings of financial distress.				
08-25-2023	RA	B160 - Fee/Employment Application		0.70	320.00	224.00
		Finalize for filing Massey & Gail's August 2023 Fee Application.				
08-25-2023	JSM	L520 - Appellate Briefs		0.40	1,160.00	464.00
		Email communication with TCC counsel re CA3 appeal schedule and procedure.				
08-27-2023	RSM	B160 - Fee/Employment Application		0.10	860.00	86.00
		Correspondence with colleagues re final fee application.				
08-27-2023	RSM	B160 - Fee/Employment Application		0.10	860.00	86.00
		Correspondence with co-counsel re final fee application.				
08-29-2023	BV	L520 - Appellate Briefs		0.40	775.00	310.00
		Corresponding with J. Massey re D. Stolz memo.				
08-29-2023	JSM	L520 - Appellate Briefs		0.30	1,160.00	348.00
		Email communication with TCC counsel re CA3 appeal schedule and procedure.				
08-30-2023	JSM	L520 - Appellate Briefs		0.30	1,160.00	348.00
		Email communication with TCC counsel re CA3 appeal schedule and procedure.				
08-30-2023	BV	L520 - Appellate Briefs		0.20	775.00	155.00
		Communicate with J. Massey re weekly meeting with committee and co-counsel re legal strategy for appeal.				
08-30-2023	UI	L520 - Appellate Briefs		0.90	485.00	436.50
		Meeting with M. Layden and B. Vallacher to discuss appeal strategy.				
08-30-2023	BV	L520 - Appellate Briefs		0.70	775.00	542.50
		Weekly meeting with committee representatives and co-counsel re legal strategy for appeal.				
08-30-2023	UI	L520 - Appellate Briefs		0.80	485.00	388.00
		Meeting with committee and co-counsel to discuss forthcoming legal strategy re possible Third Circuit appeal.				
08-30-2023	ML	L520 - Appellate Briefs		0.70	500.00	350.00
		Attending TCC committee meeting concerning CA3 appeal strategy.				
<b>Total</b>						73,351.00

### Time Summary

Professional	Hours	Amount
Bret Vallacher	18.10	14,027.50
Jonathan Massey	27.00	31,320.00
Matthew Layden	23.40	11,700.00
Rachel Morse	3.80	3,268.00
Rob Aguirre	3.30	1,056.00
Usama Ibrahim	24.70	11,979.50
<b>Total</b>		73,351.00

**Total for this Invoice** 73,351.00